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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PAUL R. HADERER and ALISSA L.
HADERER,

Plaintiffs,

v.

HEADWATER COMPANIES, LLC,

Defendant.

Case No.: 3:18-cv-00556-RCJ-WGC

**STIPULATION AND ORDER FOR
ADDITIONAL TIME TO RESPOND
TO THE COMPLAINT**
(Second Request)

Plaintiffs Paul R. Haderer and Alissa L. Haderer and Defendant Headwater Companies, LLC jointly stipulate as contained herein:

1. Plaintiffs filed this action on November 26, 2018, and a summons was issued the following day (ECF Doc. #1, #2). Plaintiffs served Defendant on November 30, 2018 (ECF Doc. #4). Its response to the complaint is due twenty-one (21) days after the date of service, that is, on or before December 21, 2018. Fed. R. Civ. P. 12(b).

2. Counsel for the parties have been in discussions in an attempt to resolve the case. In conjunction with their discussions, the Court previously granted the parties request to extend (the first request) the time for Defendant to respond to the complaint to **January 22, 2019** (ECF Doc. #5, #8). Fed. R. Civ. 6(b)(1)(B). The parties have made progress regarding discussions in resolve their disputes, but the discussions are ongoing. Therefore, the parties agree and request

1 Court approval to extend the time for Defendant to respond to the complaint for an additional 31
2 days, to **February 22, 2019**.

3 3. This is the second request for additional time to respond to the complaint. LR IA 6-
4 1(a). The extension, combined with the first extension, seeks an combined additional 63 days to
5 respond to the complaint beyond the original deadline to respond under Rule 12.

6 4. The parties make the request based on their good faith attempt to resolve their
7 dispute through negotiations prior to responding to the complaint.

8 5. Therefore, the parties request the Court grant the current proposed extension to
9 respond to the complaint.

10 **DATED** on this 18th day of January, 2019.

11 KAEMPFER CROWELL

12 By: /s/ Louis M. Bubala III
13 LOUIS M. BUBALA III
Counsel to Plaintiffs

14 **DATED** on this 18th day of January, 2019.

15 McDONALD CARANO LLP

16 By: /s/ Pat Lundvall
17 PAT LUNDVALL, SBN 3761
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18 Las Vegas, Nevada 89102
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19 Counsel to Defendant

20 **ORDER**

21 IT IS SO ORDERED.

22 By: William G. Cobb
UNITED STATES MAGISTRATE JUDGE

23 DATED: January 22, 2019
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